

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

RANDALL HAMPTON, #226420,

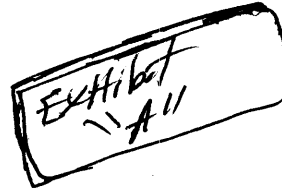
Plaintiff,

v.

PRISON HEALTH CARE SERVICES, et al.,

Defendant.

CIVIL ACTION NO. 2:06-CV-400-MHT



AFFIDAVIT

Before me, the undersigned authority, a Notary Public, in and for said County and State of Alabama at Large, personally appeared Henry L. Perkins, who being known to me, and being by me first duly sworn, deposes and says under oath as follows:

My name is Henry L. Perkins, and I am presently employed as a Correctional Officer Supervisor II, with the Alabama Department of Corrections, Bullock County Correctional Facility, Post Office Box 5107, Union Springs, AL 36089. I am over twenty-one (21) years of age.

Inmate Randall Hampton, B/226420, alleges that I, Henry L. Perkins, an employee at the Bullock County Correctional Facility, holding the rank of Captain, title of Correctional Officer Supervisor II, neglected his (inmate Hampton) medical needs (by not getting him help when needed). I respectfully deny these allegations. On no occasion have I witnessed inmate Hampton, or any other inmate, needing medical attention and done nothing to aid them.

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I'm aware that inmate Hampton allegedly has medical problems. He has told me that he has seizures. He has also told me that his legs get weak on him thus causing him to fall. <sup>429 4-5 At 106</sup> Inmate Hampton has further stated that when his legs get weak, causing him to fall, that it passes within a few seconds and he is then all right. There have also been times when inmate Hampton has attempted to harm himself. I cannot say that every time inmate Hampton had a seizure or his legs became weak on him, that he received the proper care/attention. What I can say is that I'm not aware of any incident or situation involving any illness, accident or intentional self-harm to inmate Hampton, in which he did not get proper medical attention.

As for inmate Sidney Clayton-Bey, B/224797, stating that he (Sidney Clayton-Bey) witnessed Capt. Perkins state, "Leave his stupid a—on the floor," I (Capt. Perkins) respectfully deny this allegation. I am a Captain, an authority figure, at the Bullock County Correctional Facility; and there is absolutely no way I would witness any inmate, or anyone, in a medical crisis, and not render assistance.

*Go Doctor Sedret*  
I respectfully deny all allegations made by inmates Randall Hampton and Sidney Clayton-Bey. I have no knowledge of inmate Hampton having a seizure, being on the floor in the kitchen, or even receiving any medical treatment on the day of this alleged occurrence.

  
Henry L. Perkins

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STATE OF ALABAMA)

COUNTY OF BULLOCK)

SWORN TO AND SUBSCRIBED before me and given under my hand and official seal  
on this the 27<sup>th</sup> day of September 2006.

Justine B. Person  
NOTARY PUBLIC

My Commission Expires: 2/24/2009.

SEAL

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

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RANDALL HAMPTON,  
AIS #226420,

Plaintiff,

v.

PRISON HEALTH CARE  
SERVICES, et al.,

763 F.2d 1381 (11 Cir 1984)  
Defendants.

Civil Action No.  
2:06-CV-400-MHT

JURY TRIAL REQUESTED

*C/o Plaintiff*  
*C/o Additional Defendants?*  
*for Federal Sanctions?*

ANSWER

Come now Alabama Department of Corrections Defendants Henry Perkins, LaSonja Haynes, and Joseph Fitzpatrick, by and through the undersigned counsel in the above-styled action, and file their request:

The ADOC Defendants file an answer and a demand for a jury trial pursuant to the local rules of this Court. The ADOC deny each and every allegation and demand strict proof thereof. The Defendants adopt defenses as set out in the special report as if fully set out herein.

Respectfully submitted,

Kim T. Thomas  
General Counsel  
Assistant Attorney General

/s/Albert S. Butler  
Albert S. Butler  
Assistant General Counsel  
Assistant Attorney General

**ADDRESS OF COUNSEL:**

Alabama Department of Corrections  
Post Office Box 301501  
301 South Ripley Street  
Montgomery, Alabama 36130-1501  
334-353-3885

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing documents upon:

Randall Hampton, AIS #226420  
Bullock Correctional Facility  
P. O. Box 5107  
Union Springs, Alabama 36084

by placing a copy of same in the U.S. Mail, properly addressed and postage paid, on this the 2nd day of October, 2006.

/s/Albert S. Butler  
Albert S. Butler